

## ANDERSON KILL P.C.

Attorneys and Counselors at Law

1251 AVENUE OF THE AMERICAS ■ NEW YORK, NY 10020  
TELEPHONE: 212-278-1000 ■ FAX: 212-278-1733  
www.andersonkill.com

Jerry S. Goldman, Esq.  
Jgoldman@andersonkill.com  
212-278-1569

By Facsimile and ECF

December 11, 2015

The Honorable George B. Daniels  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street, Room 1310  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*  
03 MDL 1570 (GBD) (FM)  
*Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq, et al.*,  
04-CV-1076 (GBD) (FM)

Dear Judge Daniels:

We represent the *O'Neill* Plaintiffs in the above-captioned matter. We write with regard to the default judgment as to liability Your Honor entered in favor of the *O'Neill* Plaintiffs and against certain publication defendants on October 13, 2015. See ECF No. 3067, attached hereto as Exhibit A. The default judgment references an attached "Exhibit 1" that lists the defaulted publication defendants. It has come to our attention however that Exhibit 1 is not attached to the judgment on the MDL docket. Accordingly, we respectfully request that Your Honor add Exhibit 1 to the October 13, 2015 default judgment. A proposed modified judgment containing Exhibit 1 is attached hereto as Exhibit B.

We thank Your Honor for the Court's attention to this matter.

Respectfully submitted,

/s/ Jerry S. Goldman

Jerry S. Goldman, Esq.

ANDERSON KILL P.C.

1251 Avenue of the Americas, 42nd Floor  
New York, NY 10020

Attorneys for the *O'Neill* Plaintiffs in:  
*Estate of John P. O'Neill, Sr., et al. v. The*  
*Republic of Iraq, et al.*, 04-CV-1076

Enclosures

cc: The Honorable Frank Maas (via Fax & ECF)  
All Counsel of Record (via ECF)